

1 COOLEY LLP
BOBBY GHAJAR (198719)
2 (bghajar@cooley.com)
COLETTE GHAZARIAN (322235)
3 (cghazarian@cooley.com)
1333 2nd Street, Suite 400
4 Santa Monica, California 90401
Telephone: (310) 883-6400
5 MARK WEINSTEIN (193043)
(mweinstein@cooley.com)
6 KATHLEEN HARTNETT (314267)
(khartnett@cooley.com)
7 JUDD LAUTER (290945)
(jlauter@cooley.com)
8 ELIZABETH L. STAMESHKIN (260865)
(lstameshkin@cooley.com)
9 3175 Hanover Street
Palo Alto, California 94304-1130
10 Telephone: (650) 843-5000
11 CLEARY GOTTlieb STEEN & HAMILTON LLP
ANGELA L. DUNNING (212047)
12 (adunning@cgsh.com)
1841 Page Mill Road, Suite 250
13 Palo Alto, California 94304
Telephone: (650) 815-4131

14 *[Full Listing on Signature Page]*

15 *Counsel for Defendant Meta Platforms, Inc.*

16 UNITED STATES DISTRICT COURT
17
18 NORTHERN DISTRICT OF CALIFORNIA
19
20 SAN FRANCISCO DIVISION

20 RICHARD KADREY, *et al.*,
21 Individual and Representative Plaintiffs,
22 v.
23 META PLATFORMS, INC., a Delaware
corporation;
24 Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DEFENDANT META PLATFORMS, INC.'S
RESPONSE TO COURT'S DISCOVERY ORDER
OF DECEMBER 5, 2024 [DKT. 312]**

Pursuant to the Magistrate Judge's Order on December 5, 2024 (Dkt. 312), Defendant Meta Platforms, Inc. ("Meta") hereby submits as the attached **Exhibit 1** an unredacted copy of Exhibit E (Dkt. 276-4) to Meta's Opposition to Plaintiffs' Administrative Motion to File Excess Pages and to Establish a Privilege Briefing Schedule (Dkt. 275).

Dated: December 5, 2024

COOLEY LLP

By: /s/ Cole A. Poppell

Bobby Ghajar
Philip Morton
Mark Weinstein
Kathleen Hartnett
Matthew Brigham
Judd Lauter
Liz Stameshkin
Colette Ghazarian
Juan Pablo Gonzalez
Cole A. Poppell

LEX LUMINA PLLC
Mark A. Lemley

CLEARY GOTTlieb STEEN &
HAMILTON LLP
Angela L. Dunning

Attorneys for Defendant
META PLATFORMS, INC.

Full Counsel List

COOLEY LLP
PHILLIP MORTON (*pro hac vice*)
(pmorton@cooley.com)
COLE A. POPPELL (*pro hac vice*)
(cpoppell@cooley.com)
1299 Pennsylvania Avenue, NW, Suite 700
Washington, DC 20004-2400
Telephone: (202) 842-7800

COOLEY LLP
MATTHEW BRIGHAM (191428)
(mbrigham@cooley.com)
JUAN PABLO GONZALEZ (334470)
(jgonzalez@cooley.com)
3175 Hanover Street
Palo Alto, California 94304-1130
Telephone: (650) 843-5000